

IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
CANTON DIVISION

IN RE:	:	Case No.: 22-61307
	:	
TINA S. SIMMONS	:	Chapter: 13
	:	
Debtor.	:	JUDGE JOHN GUSTAFSON

MOTION FOR CONTINUANCE OF CONFIRMATION HEARING

Now comes Debtor Tina S. Simmons, by and through counsel, and respectfully moves the Court for a continuance of the confirmation hearing on Debtor's Chapter 13 Plan filed on December 22, 2022 (Doc. 2), Midland Mortgage's objection to confirmation filed on January 23, 2023 (Doc. 10) and the Trustee's Objection thereto filed on February 21, 2023 (Doc. 15), presently scheduled for March 8, 2023 at 2:00 p.m. Debtor has been working with the Trustee and Midland Mortgage in order to reach an amicable resolution on this matter. Additional time is need to work out the pending issues. The Trustee and Midland Funding do not oppose the continuance.

WHEREFORE, Debtor respectfully requests that hearing scheduled for March 8, 2023 at 2:00 p.m., be rescheduled until April 19, 2023 at 2:00 p.m.

Respectfully submitted,

/s/ Rebecca K. Hockenberry
Rebecca K. Hockenberry (0074930)
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Counsel for Debtors

CERTIFICATE OF SERVICE

I certify that on March 3, 2023, a true and correct copy of the **MOTION FOR CONTINUANCE OF CONFIRMATION HEARING** was served:

Via the court's Electronic Case Filing System on those entities and individuals who are listed on the Court's Electronic Mail Notice List:

- Stephen R. Franks, on behalf of Midland Mortgage, at amps@manleydeas.com
- Dynele L Schinker-Kuharich, Chapter 13 Trustee, at DLSK@Chapter13Canton.com, dschinkerkuharich@ecf.epiqsystems.com
- United States Trustee (Registered address)@usdoj.gov

And by regular U.S. mail, postage prepaid, on:

Tina Simmons
725 Cleveland Avenue
Ashland, OH 44805

All creditors on the attached creditor matrix

/s/ Rebecca K. Hockenberry
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